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Attorneys for Plaintiff  
THE OSO GROUP, LTD.

IN THE UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

THE OSO GROUP, LTD., a California  
Corporation,

Plaintiff,

vs.

BULLOCK & ASSOCIATES, INC.,  
SERVICE EMPLOYEES  
INTERNATIONAL UNION, CTW/CLC,  
and DOES 1 through 100,

Defendants.

**CASE NO. 09-CV-1906 SC**

**STIPULATION AND [PROPOSED]  
ORDER CONTINUING HEARING ON  
DEFENDANTS' MOTION TO  
DISMISS FOR LACK OF SUBJECT  
MATTER JURISDICTION AND  
RELATED MATTERS**

1 Plaintiff THE OSO GROUP, LTD., and Defendants BULLOCK &  
2 ASSOCIATES, INC., and SERVICE EMPLOYEES INTERNATIONAL UNION,  
3 CTW/CLC, by and through their respective counsel of record, hereby submit the  
4 following Stipulation and Proposed Order to continue the hearing on Defendants'  
5 Motion to Dismiss for Lack of Subject Matter Jurisdiction, currently set for July 10,  
6 2009.

7 WHEREAS, Plaintiff filed a Complaint in the above-captioned case on May  
8 1, 2009;

9 WHEREAS, Defendants jointly filed a motion to dismiss Plaintiff's  
10 complaint for lack of subject matter jurisdiction on May 26, 2009, which is  
11 currently set for hearing on July 10, 2009;

12 WHEREAS, on May 1, 2009, this Court issued an Order Setting Case  
13 Management Conference and an Order Setting Initial Case Management  
14 Conference and ADR Deadlines, setting an Initial Case Management Conference  
15 in this matter for August 14, 2009 and requiring the parties to *inter alia*: (1) meet  
16 and confer re initial disclosures and a discovery plan, and file an ADR  
17 Certification by July 24, 2009; and, (2) file Rule 26(f) reports, complete initial Rule  
18 26 disclosures, and file Case Management Statements by August 7, 2009;

19 WHEREAS, the parties have mutually agreed that the hearing on  
20 Defendants' Motion to Dismiss for Lack of Subject Matter Jurisdiction may be  
21 continued to August 14, 2009 to accommodate Plaintiff's schedule.

22 THEREFORE, Plaintiffs and Defendants, by and through their respective  
23 counsel of record, hereby stipulate, and request the Court to order, as follows:

24 1. The hearing on Defendants Motion to Dismiss for Lack of Subject  
25 Matter Jurisdiction, currently set for July 10, 2009, shall be continued to August  
26 14, 2009. Plaintiff's opposition or other response to the pending motion shall be  
27 filed and served on or before July 15, 2009, and Defendants' reply, if any, shall  
28 be filed and served on or before July 31, 2009.

2. Pending the continued hearing on Defendants' Motion to Dismiss for Lack of Subject Matter Jurisdiction, all other requirements and deadlines as previously set by this Court's Order Setting Case Management Conference and Order Setting Initial Case Management Conference shall be held in abeyance pending further order of the Court, except that the Case Management Conference will remain on calendar for August 14, 2009 as a status conference, unless the Court notifies the parties to the contrary.

IT IS SO STIPULATED.

Dated: June 19, 2009

**ALTSHULER BERZON LLP**

By: /s/ Jeffrey B. Demain  
JEFFREY B. DEMAIN  
Attorneys for Defendants

Dated: June 19, 2009

**SEGAL & KIRBY LLP**

By: /s/ James P. Mayo  
MALCOLM S. SEGAL  
JAMES P. MAYO  
Attorneys for Plaintiff  
THE OSO GROUP, LTD.

Dated: June 19, 2009

**KASOWITZ, BENSON, TORRES & FREIDMAN LLP**

By: /s/ Donald J. Putterman  
DONALD J. PUTTERMAN  
Attorneys for Plaintiff  
THE OSO GROUP, LTD.

**ORDER**

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: June 19, 2009

The Honorable Judge United States District Court

